

1 TONI H. WHITE (SBN 210119)
2 ATTORNEY AT LAW
3 P.O. Box 1081
4 El Dorado, CA 95623
5 Telephone: (530) 885-6244

6 Attorney for Defendant
7 MARTIN CERVANTES VASQUEZ

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 MARTIN CERVANTES VASQUEZ,
15 Defendant

CASE NO. 2:20-CR-00193 DJC

**STIPULATION TO CONTINUE
SENTENCING HEARING; ORDER**

16
17 Defendant MARTIN CERVANTES VASQUEZ, by and through his counsel of record, TONI
18 WHITE, and the GOVERNMENT, by and through Assistant United States Attorney DAVID
19 SPENCER hereby stipulate as follows:

- 20 1. By previous order, this matter was set for sentencing on May 8, 2025.
21 2. By this stipulation, defendant now moves to continue the sentencing to May 29, 2025,
22 at 9:00a.m. The GOVERNMENT does not oppose this request.
23 3. The presentence report has been completed and disclosed.
24 4. Mr. Cervantes Vasquez, through counsel, has provided multiple safety valve statements to
25 the Government in support of his request for safety valve consideration. The safety valve procedure
26 allows for the Government to request additional and/or follow-up information so that it can
27 determine whether it will agree that a defendant has met the prong of safety valve that requires his
28 statement.

1 5. The Government reviewed the most recent statement provided by Mr. Cervantes and asked
2 for additional follow-up. Counsel had a scheduled meeting with Mr. Cervantes and our appointed
3 interpreter on April 21, 2024. On that day, our interpreter had to cancel due to a sudden, and very
4 serious, family emergency. Our interpreter is recently back at work and we have another meeting
5 scheduled for Wednesday May 8, 2025. Once we interview Mr. Cervantes again, and provide
6 additional information to the Government, the Government will need time to assess the information.
7 As such, we are requesting a continuance of the sentencing.

8 6. The probation officer, Sarah Brown, is available and is in agreement with the sentencing
9 date requested by the parties.

10 IT IS SO STIPULATED.

11 Dated: May 2, 2025

MICHELE BECKWITH
Acting United States Attorney

12
13 By: /s/ Toni White for
DAVID SPENCER
14 Assistant U.S. Attorney

15 For the United States

16
17 Dated: May 2, 2025

By: /s/ Toni White
TONI WHITE
18 For Defendant Martin Cervantes Vasquez

19
20
21 **ORDER**

22 IT IS SO FOUND AND ORDERED this 2nd day of May, 2025.
23

24 Dated: May 2, 2025

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
25 UNITED STATES DISTRICT JUDGE
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